1	Jane G. Kearl (CA 156560)	
2	Colin C. Holley (CA 191999) WATT, TIEDER, HOFFAR & FITZGERALD, L.	L.P.
3	2040 Main Street, Suite 300 Irvine, CA 92614	
4	Telephone: 949-852-6700 Facsimile: 949-261-0771	
5	Email: jkearl@watttieder.com cholley@watttieder.com	
6	Attorneys for Creditor	
7	Barnard Pipeline, Inc.	
8		BANKRUPTCY COURT FRICT OF CALIFORNIA
9		CISCO DIVISION
10	In re:	Bankruptcy Case Case No. 19-30088 (DM)
11	PG&E CORPORATION,	Chapter 11
12	-and-	(Lead Case) (Jointly Administered)
13	PACIFIC GAS AND ELECTRIC COMPANY,	(Johnty Administered)
14	·	
15	Debtors. ☐ Affects PG&E Corporation	NOTICE OF CONTINUED PERFECTION
16	☐ Affects Pacific Gas and Electric Company	OF MECHANICS LIEN PURSUANT TO 11 U.S.C. § 546(b)(2)
17	□ Affects both Debtors	Tehama County (Lien 2019001048)
18	* All papers shall be filed in the Lead Case,	
19	No. 19-30088 (DM)	
20		
21	Barnard Pipeline, Inc. ("Barnard"), b	y and through its undersigned counsel, hereby gives
22	notice of continued perfection of its mechanic	cs lien under 11 U.S.C. § 546(b)(2), as follows:
23	Barnard has provided and deli	vered labor, services, equipment, and/or materials for
24	the construction and improvements of project	s located in the County of Tehama, State of California
25	(the "Property"), the legal description for wh	ich is set forth in the Claim of Mechanics Lien, a true
25	I .	
2526	copy of which is attached hereto as Exhibit A	(the "Mechanics Lien").
		(the "Mechanics Lien"). PG&E Corporation and/or Pacific Gas and Electric

WATT, TIEDER, HOFFAR &

FITZGERALD, L.P. ase: 19-30088 Doc# 1439 Filed: 04/15/19 Entered: 04/15/19 Levine 19

of Title 11 of the United States Code (the "Bankruptcy Code") on January 29, 2019 (the "Petition Date").

- On January 28, 2019, before the Petition Date, Barnard properly and timely recorded 3. its Mechanics Lien under California Civil Code § 8400, et seq. in the Official Records of Tehama County, State of California.
- Through January 28, 2019, the amount owing to Barnard subject to its Mechanics 4. Lien is at least \$1,729.97, exclusive of accruing interest and other charges, and additional amounts which have continued and are continuing, to accrue after the Petition Date.
 - California Civil Code § 8460(a) provides that: 5.

The claimant shall commence an action to enforce a lien within 90 days after recordation of the claim of lien. If the claimant does not commence an action to enforce the lien within that time, the claim of lien expires and is unenforceable[.]

- Pursuant to California Civil Code § 8460, an action to enforce a lien must be 6. commenced within 90 days after recordation of the claim of lien. However, section 362 of the Bankruptcy Code automatically stays Barnard from filing a state court action to enforce its mechanics lien. See 11 U.S.C. § 362.
 - Section 546(b)(2) of the Bankruptcy Code provides that when applicable law 7.

... requires seizure of such property or commencement of an action to accomplish such perfection, or maintenance or continuation of perfection of an interest in property; and ... such property has not been seized or such an action has not been commenced before the date of the filing of the petition; such interest in such property shall be perfected, or perfection of such interest shall be maintained or continued, by giving notice within the time fixed by such law for such seizure or such commencement.

See 11 U.S.C. § 362; see also Village Nurseries v. Gould (In re Baldwin Builders), 232 B.R. 406, 410-11 (9th Cir. 1999); Village Nurseries v. Greenbaum, 101 Cal.App.4th 26, 41 (Cal. Ct. App. 2002).

8. Accordingly, Barnard hereby provides notice of its rights as a lienholder in the Property pursuant to California's mechanics lien law. Barnard is filing and serving this notice to perfect, preserve, maintain, and continue the perfection of its lien and its rights in the Property to

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comply with the requirements of California state law, 11 U.S.C. §§ 362(a), 362(b)(3), and 546(b)(2), and any other applicable law. This notice constitutes the legal equivalent of having recorded a mechanics lien in the recorder's office for the county where the Property is located and then having commenced an action to foreclose the lien in the proper court. By this notice, the Debtors and other parties in interest are estopped from claiming that the lawsuit to enforce Barnard's mechanics lien was not timely commenced pursuant to applicable state law. Barnard intends to enforce its lien rights to the fullest extent permitted by applicable law. The interests, perfected, maintained, or continued by 11 U.S.C. § 546(b)(2) extend in and to the proceeds, products, offspring, rents, or profits of the Property.

- The filing of this notice shall not be construed as an admission that such filing is 9. required under the Bankruptcy Code, the California mechanics lien law, or any other applicable law. In addition, Barnard does not make any admission of fact or law, and Barnard asserts that its lien is senior to and effective against entities that may have acquired rights or interests in the Property previously.
- The filing of this notice shall not be deemed to be a waiver of Barnard's right to 10. seek relief from the automatic stay to foreclose its mechanics lien and/or a waiver of any other rights or defenses.
 - Barnard reserves all rights, including the right to amend or supplement this notice. 11.

Dated: April

WATT, TIEDER, HOFFAR & FITZGERALD, L.L.P.

By:

Jane G. Kearl (CA 156560) Colin C. Holley (CA 191999) 2040 Main Street, Suite 300

Irvine CA 92614

Telephone: 949-852-6700 Facsimile: 949-261-0771

ikearl@watttieder.com Email:

cholley@watttieder.com

Attorneys for Creditor Barnard Pipeline, Inc.

HOFFAR &

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CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2019, I caused a copy of the foregoing Notice of Continued Perfection of Mechanics Lien Pursuant to 11 U.S.C. § 546(b)(2) to be sent via e-mail and/or first-class mail to the parties identified in the Master Core/2002 Service List attached hereto as **Exhibit B**.

Jane G. Kearl

WATT, TIEDER,
HOFFAR &

FITZGERALD, L.L.P. ATTORNEYS AT CASE: 19-30088 Doc# 1439 Filed: 04/15/19

NOTICE OF CONTINUED PERFECTION OF MECHANICS LIEN BURSHANT, TO 11 U.S.C. §

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27	EXHIBIT A
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WATT, TIEDER, HOFFAR & FITZGERALD, LC. ATTORNEYS AT LAW IRVINE	NOTICE OF CONTINUED PERFECTION OF Entered: MAPIS/NOCE4: 40: 5 - NOTICE OF CONTINUED PERFECTION OF Entered: MAPIS/NOCE4: 40: 50: 50: 50: 50: 50: 50: 50: 50: 50: 5

Recording requested by: Barnard Pipeline, Inc.

And when recorded mail this document to:

Jane G. Kearl, Esq. Robert C. Shaia, Esq. Watt, Tieder, Hoffar & Fitzgerald, LLP 2040 Main Street, Suite 300 Irvine, CA 92614 Doc # 2019001048
Page 1 of 3
Pate: 1/28/2019 10:42A
Recording Requested By:
GENERAL PUBLIC
Filed & Recorded in Official Records
of TEHAMA COUNTY
JENNIFER A. VISE
COUNTY CLERK & RECORDER
Fee: \$95.00

For recorder's use

MECHANICS' LIEN (Cal. Civ. Code § 8416, et seq.)

1. BARNARD PIPELINE, INC. ("Claimant") claims a mechanics lien for the labor, services, equipment and/or materials described in paragraph 2, furnished for a work of improvement on that certain real property located in the City of Corning, County of Tehama, State of California, and more particularly described as:

All right, title and interest of Pacific Gas and Electric Company ("PG&E") at 23700 Co. Rte. A9, Corning CA, Lat: 39.927694, Long: -122.150307, and all appurtenances and easements related thereto, including specifically, without limitation, all improvements, structures, and pipelines in or on which Claimant provided labor, services, equipment, and/or materials as set forth in paragraph 2.

- 2. After deducting all just credits and offsets, the sum of \$1,729.97, together with interest at the rate of 10% per annum from January 22, 2019, is due Claimant for the following: labor, services, equipment and/or materials for installation of cathodic test stations on high pressure natural gas pipelines, and related construction work performed under the Alliance Agreement between Claimant and PG&E and Contract Work Authorization No. 2501594574, for UID#s 26031 26032 26030 26033 26034 26730 26881 26882, or otherwise requested by PG&E.
- 3. Claimant furnished the labor, services, equipment and/or materials, at the request of: PG&E.
- 4. The name and address of the owner(s) or reputed owner(s) of the real property is/are: PG&E, 77 Beale Street, 32nd Floor, San Francisco, CA 94105.

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5. Claimant's address is: 701 Gold Avenue, Bozeman, MT 59715.

Dated January 22, 2019

BARNARD PIPELINE, INC.

Zach Bowler, Vice Presiden

<u>VERIFICATION</u>

I, Zach Bowler, am the Vice President of Claimant on the foregoing Mechanics Lien and am authorized to make this verification for and on its behalf. I have read the foregoing Mechanics Lien and know the contents of the Mechanics Lien to be true of my own knowledge.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated January 22, 2019

Zach Bowler, Vice President

NOTICE OF MECHANICS LIEN

ATTENTION!

Upon the recording of the enclosed MECHANICS LIEN with the county recorder's office of the county where the property is located, your property is subject to the filing of a legal action seeking a court-ordered foreclosure sale of the real property on which the lien has been recorded. That legal action must be filed with the court no later than 90 days after the date the mechanics lien is recorded.

The party identified in the enclosed mechanics lien may have provided labor or materials for improvements to your property and may not have been paid for these items. You are receiving this notice because it is a required step in filing a mechanics lien foreclosure action against your property. The foreclosure action will seek a sale of your property in order to pay for unpaid labor, materials, or improvements provided to your property. This may affect your ability to borrow against, refinance, or sell the property until the mechanics lien is released.

BECAUSE THE LIEN AFFECTS YOUR PROPERTY, YOU MAY WISH TO SPEAK WITH YOUR CONTRACTOR IMMEDIATELY, OR CONTACT AN ATTORNEY, OR FOR MORE INFORMATION ON MECHANICS LIENS GO TO THE CONTRACTORS STATE LICENSE BOARD WEB SITE AT www.csib.ca.gov.

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PROOF OF SERVICE

I, Julie Benton, declare:

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I am employed in the County of Orange, State of California. I am over the age of 18 years and not a party to the within action. My business address is 2040 Main Street, Suite 300, Irvine, California 92614-6232.

On January 23, 2019, I served \(\square\) the originals \(\square\) true copies of the following document(s) described as MECHANICS LIEN and NOTICE OF MECHANICS' LIEN on the interested parties in this action, by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, the United States mail at Irvine, California addressed as set forth below:

Pacific Gas & Electric Company (PG&E) 77 Beale Street, 32nd Floor San Francisco, CA 94105

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 23, 2019, at Irvine, California.

Mr Blud e Benton

WATT, TIEDER, HOFFAR & FITZGERALD, L.L.P.

PROOF OF SERVICE

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	949-313-50	949-474-1880	92614	Z (2	San Francis	Suite 4925	555 California Street	-	Ę	Counsel for Infasys Umited, Counsel for ACRT, Inc.
betvederniegaidd@gman.com kcapuzi@beneschlaw.com mbarrie@beneschlaw.com	312-767-91	415-659-7924	2			1		To warrie	BENESCH, FRIEDLANDER, COPLAN & ARONOFF	Counsel for Infosys Limited, Counsel for ACK1, Inc.
kcapuzzi@beneschiaw.com	302-442-7012	302-442-7010	19801	n DE	Wilmington	Suite 801	222 Delaware Avenue		BENESCH, FRIEDLANDER, COPLAN & ARONOFF	
beivederelegalect@gman.com			4100		CONTRACTOR	ers anno	1777 Borel Place		BELVEDERE LEGAL, PC	Counsel for Dan Clarke
	415-513-5985	415-513-5980	900/1-3485	2 2	Los Angeles		Suite 2200	McCurnin, Christopher D. Higashi	Barton, Klugman & Oetting LLP	oursel for City of Morean Hill
chigashi@bkolaw.com thigham@bkolaw.com	213-625-1832	213-621-4000	20072 2485				350 South Grand Avenue,	Attn: Terry L. Higham, Thomas E.		
3)		***************************************	75213	×	Dallas		#1100	Attn: Scott Summy, John Fiske	Baron & Budd, P.C.	Public Entities Impacted by the Wildfires
		214-521-3605		(3102 Oak Lawn Avenue		OF STREET	ounsel for Bank of America, N.A.
ssummy@baronbudd.com		646-855-2464	10036	YN	ark New York		Mail Code: NY1-100-21-01	Attn: John McCusker	Bank of America	RENCO Limited and Louisiana Energy Services, LLC
- 1-	0C69-T05-0T#	302-252-4428	19801	n DE	Wilmington	11th Floor	919 North Market Street	Atta: Mathew & Summers	BALLARD SPAHR LLP	scovery Hydrovac
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irochester@bakerdonelson.com jhayden@bakerdonelson.com	5200 504-636-4000	504-566-5200	7070				201 St. Charles Avenue,	Attn: Lacey E. Rochester, Jan M.	Baker, Donelson, Bearman, Caldwell &	Counsel for Phillips and Jordan, Inc., Counsel for Counsel for
jrowland@bakerdonelson.com	615-744-5544	615-726-5544	37201	TN	Nashville	Sulte 800	211 Commerce Street	Attn: John H. Rowland	Baker, Donelson, Bearman, Caldwell &	TO COMPANY STATE OF THE STATE O
		415-291-6200	94111	8	San Francisc	Suite 3600	101 California Street	Attn: Navi S. Dhillon	Baker Botts LL.P.	Counsel for NRG Energy Inc., Cleanway Energy, Inc.,
		2147377000	75201	×	Dallas	Suite 1000	2001 Ross Avenue	Roberts, Kevin Chiu	Baker Botts LLP.	Counsel for NRG Energy Inc., Clearway Energy, Inc., and Clearway Energy Group U.C.
lan.Roberts@BakerBotts.com Keyln.Chlu@BakerBotts.com		714-953-6500		!				Attn: C. Luckey McDowell, lan E.		Laurians.
Luckey.Mcdowell@BakerBotts.com		415-542-8730	94111	G CA	San Francisc	Suite 100	1160 Battery Street	Attn: Robert A. Julian, Cecily A. Dumas	BAKER & HOSTETLER ILP	Proposed Counsel for Official Committee of York
rjulian@bakerlaw.com			-	5	LOS Angeles	Suite 1400	rd 11601 Wilshire Blvd.	Attn: Eric E. Sagerman, Lauren T. Attard	BAKER & HOSTETLER, LLP	Proposed Counsel for Citical Communication for
-	310-820-8859	310-442-8875	9025-0509				Troubage from 000000	Attn: MAKIHA E. KOMEKO	BAILEY AND ROMERO LAW FIRM	Plaintiffs Claimants
marthaeromerolaw@gmail.com		562-889-0182	90601	2	Whittier		and the parameter Boulevand		Attorney Centeral Or Camponial	Counsel to California State Agencies Special Bankruptcy Counsel for Certain Fire Damage
	213-897-2802	213-269-6326	90013	S	Los Angeles	Sulte 1702	300 South Spring Street	Attn: XAVIER BECERRA, MARGARITA PADILLA, and JAMES POTTER	Assessment of California	Counsel to Lawrollia State Agencies
_			2000-71066	5	0 Oakland	P.O. Box 70550	1515 Clay Street, 20th Floor	PADILLA, and JAMES POTTER	Attorney General of California	Trifferni Chato Agonolos
James, Potter@doj.ca.gov Margarita, Padilla@doj.ca.gov	510-622-2270	\$10-879-0815	2000	ľ		OUDIT BIRE	455 Golden Gate Avenue	VALUEZ, and ANNADEL ALMENDRAS ARTIN: XAVIER BECERRA, MARGARITA	Attorney General of California	Counsel to California State Agencies
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39 stoven.fruchter@arnoroporum.com 37 lje5786@att.com	212-836-8689	212-836-8000	10019		New York		250 West 55th Street	Attn: Brian Lohan, Esq., Steven		
-		C10-020-010	50013-1005	S	Los Angeles	48th Floor	555 West Fifth Street	Attn: Aram Ordubeglan	ARENT FOX LLP	Counsel for BOKF, NA, solely in its capacity as
11 Aram.Ordubegian@arentfox.com	213-629-7401	212 628-7400			Too on the contract of	HOLIT FIODS	555 West Hith Street	Work	Arent Fox LLP	
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	212-484-3990	212-484-3900	10019	NY	New York	42nd Floor	1301 Avenue of the	Attn: Andrew I. Silfen, Beth M.		Counsel for BOKF, NA, solely in its capacity as
Andrew.Silfen@arentfox.com Beth.Brownstein@arentfox.com	9400000	949-748-1000	92660	ach CA	Newport Bea	Sulte 300	4701 Von Karman Ave	and John C. Thornton	ANDREWS & THORNTON	Counsel to Agajanian, Inc.
	UPSESTEDED						Olic or John Sons	Atto: Anne Andrews, Sean T. Higgins,	Akin Gump Strauss Hauer & Feld LLP	Noteholders of Pacific Gas and Electric Company
9 5	212-872-1002	212-872-1000	10036	NY	New York		One Boyant Park	Attn: Michael S. Stamer, Ira S.		cured
mstamer@akingump.com	**************************************	310-229-1000	90067	Q	Los Angeles	Suite 600	1999 Avenue of the Stars	Attn: David P. Simonds	Akin Gump Strauss Hauer & Feld LLP	Counsel to the Ad Hoc Committee of Senior Unsecured
	1000-2001	415-765-9500	94104		San Francisco	Suite 1500	580 California Street	Attn: Ashley Vinson Crawford	Akin Gump Strauss Hauer & Feld LLP	
_	214-981-9339	214-720-4300	75201	TX	Dallas		3600	ARCHIYAN	AKERMAN LLP	
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		661-665-5791	93311	S	Bakersfield		10000 Ming Avenue	Attn: Ron A. Symm	Aera Energy LLC	Counsel for Aera Energy LLC, Midway Sunset Congeneration Company
			1000	S	San Diego	Suite Soil	402 West Broadway	Brittany S. Zummer	ADLER LAW GROUP, APLC	
gemarr59@hotmail.com bzummer@TheAdlerFirm.com	619-342-9600	619-531-8700	92101	3	2			Attn: E. Elllot Adler, Geoffrey E. Marr,		for for Mirna Trettevik, including other Fire

Page 1 of 10

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1			104-063-0030	80508	GA	Atlanta		5300	Attn: Bryan E. Bates, Esq.	Dentons US LLP	Coursel to Southwire Company LLC
Ins.com	98 bryan_bates@dentons.com	404-527-4198	ADA_537_AD73				-	303 Peachtree St., NE, Suite	Attn: Xan Knight	Debra Grassgreen	Creditor and Counsel to Debra Grassgreen
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	david.schiff@davispolk.com timothy.graulich@davispolk.com	212-701-5331	212-450 4331	10017	Z.				Attn: Eli J. Vonnegut, David Schiff,		Counsel for the agent under the Debtors' proposed debtor in possession financing facilities, Counsel for the Utility
Q	- 10	1117-75/1-059	650-752-2000	94025	2	Menio Park		1600 El Comino Real	Attn: Andrew D. Yaphe	Davis Polk & Wardwell LLP	Counsel for Citibank N.A., as Administrative Agent for the Utility Revolving Credit Facility
issoik com		650-394-8672	650-453-3600	94065	G.	Redwood Shores	Suite 145	333 Twin Dolphin Drive	Attn: Michael S. Danko, Kristine K. Meredith, Shawn R. Miller	DANKO MEREDITH	Counsel for Fire Victim Creditors
IW.com	kmeredith@dankolaw.com								Attn: Inomas F. Roeker	Crowell & Moring LLP	Counsel for Creditors and Parties-in-Interest NEXANT
com	mdankn@dankolaw.com	2002-02-02-02-02-02-02-02-02-02-02-02-02	415-986-2800	94111	Q	San Francisco	26th Floor	3 Embarcadero Center	Attn: lacie n. roon	Crowell & Moring LLP	Counsel to Renaissance Reinsurance LTD.
4	b Woon@crowen.com	1115-879-202	202-624-2500	20004	DC	Washington		1001 Dennsylvania Ave.	Attn: Monique D. Aimy	Crowell & Moring LLP	Counsel for Creditors and Parties-in-Interest NEXANT
1	202-628-5116 malmy@crowell.com	202-628-5110	415-986-2827	20004	DC	Washington		1001 Pennsylvania Avenue,			Company of actions and action action and action action and action action action action action action and action actio
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3	mplevin@crowell.com		0/70-000-020	95695	G	Woodland	Room 201	625 Court Street	Attn: Fric May	County of Sonoma	Attorney for County of Sonoma
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/1 F	alr@coreylaw.com smb@coreylaw.com sm@coreylaw.com	850-871-4144	SED-071-5666						Attn: Dario de Ghetaldi, Amanda L Riddle Steven M. Berki, Sumble	COOPER, WHILE IS COOPER, IN	Volcano Telephone Company and 105 resecom
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		0.553-667-317						701 California Street, 17th			izs Services Coursel for Gowan Construction Company Inc., Calaveras Telephone Company, Kerman Telephone Co., Plinades Telephone Co., The Ponderosa
state.pa.us	ra-ll-ucts-bankrupt@state.pa.us	717-787-7671	717-787-7627	17121	PA	Harrisburg	702 Street, Room	Callections Support Unit	Department of Labor and Industry	Commonwealth of Pennsylvania	Office of Unemployment Compensation
- Demon	mschierberl@cggsh.com	212-225-3999	212-255-2000	10006	NY	New York		One Liberty Plaza	Attn: Lisa Schweitzer, Margaret Schlerberl	Cleany Garrilon Cheen & Hamilton LLP	_
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	kwinick@clarktrev.com	213-624-9441	213-629-5700	90017	8	Los Angeles	12th Floor	800 Wilshire Boulevard	Attn: Kimberly S. Winick		nterested Party California Community Choice
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In re: PG&E Carporation, et al. Master Service List Case No. 19-30088

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